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February 14, 2022

Via ECF Only

Honorable John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edward Shin
Case No.: 1:19-cr-00552-JPC

Dear Judge Cronan:

I represent Edward Shin in the above-referenced matter. I am responding to your Memorandum Order of today concerning an April 18, 2022 trial date.

Robert Basil and I are available on April 18. However, our jury consultant will in the prior week be conducting jury selection in the United States District Court in San Francisco on a RICO case. Our consultant believes that that jury selection will be completed by Friday, April 15, but, as the Court knows, jury selection can be unpredictable. Accordingly, I am writing to ask if the Court would consider starting the trial on Wednesday, April 20 to ensure that our jury consultant is available.

In the event the Court does not wish to begin the trial on April 20 or April 25, Mr. Basil and I are available through May and June with the exception of a May 16 trial date on a federal civil trial for Mr. Basil (which may be moved by the Ad Hoc Committee). I am not available the last week of June 2022 because my son is getting married in Chicago on July 16, 2022 and I would expect that the three-week trial in this case would not be concluded in time for me to travel to Chicago.

I have received more information from our jury consultant. In addition to April 20 and April 25, she would be available the weeks of May 23, May 31, June 6 and June 20 as of today's date.

Our jury consultant had previously indicated to me that she may have jury selection on May 9 on another case. When I spoke to her today, I learned that that jury selection may extend for more than five days making her unavailable for the weeks of May 9 and May 16.

Respectfully submitted,

/s/ Paul B. Brickfield

Paul B. Brickfield

cc: Robert Basil, Esq. (via ECF only)
Assistant U.S. Attorney Tara LaMorte (via ECF only)
Assistant U.S. Attorney Anden Chow (via ECF only)
Assistant U.S. Attorney Jessica Greenwood (via ECF only)

In theory, the Court is amenable to an April 20, 2022 trial-ready date, but is concerned with conflicts starting on May 10, 2022. By 11:00 a.m. on February 15, 2022, the parties shall confer and file a letter with the Court explaining how long they currently anticipate the trial to take, and whether an April 20, 2022 trial date would allow enough time for the trial to be completed by May 10, 2022. The Court is willing to schedule longer than usual trial days to ensure that the trial can be completed on this timeframe.

SO ORDERED.

Date: February 14, 2022

New York, New York



JOHN P. CRONAN

United States District Judge